

Sheehan & Associates, P.C.  
spencer@spencersheehan.com

60 Cuttermill Road, Suite 409, Great Neck NY 11021-3104

tel. (516) 468-7080 fax (516) 234-7800

**USDS SDNY**  
**DOCUMENT**  
**ELECTRONICALLY FILED**  
**DOC #:** \_\_\_\_\_  
**DATE FILED:** 7/09/2021

July 8, 2021

District Judge John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl St  
New York, NY 10007

Re: 1:20-cv-10924-JGK  
Glover et al. v. Bob's Discount Furniture, LLC et al.

Dear District Judge Koeltl:

This office represents the Plaintiffs. On June 23, 2021, Plaintiffs filed a first amended complaint ("FAC"). On June 24, 2021, the Clerk required Plaintiffs to refile the FAC and correctly identify the relevant parties in the CM/ECF system. On July 7, 2021, Plaintiffs refiled the FAC. ECF No. 16.

Under Fed. R. Civ. P. 15(a)(3), Defendant Bob's Discount Furniture, LLC ("Defendant Bob's") would have until July 21, 2021, to respond or answer the FAC. The FAC contains new factual allegations based on an additional plaintiff, and the addition of Defendant Guardian Protection Products, Inc. ("Defendant Guardian"). The FAC also includes allegations based on legal theories which were not raised or alluded to in the complaint.

Counsel for Plaintiffs and Defendant Bob's request that Defendant Bob's time to answer or respond to the FAC be extended by 30 days, until August 20, 2021. This extension will also permit service of process to be effected upon Defendant Guardian.

Counsel for Plaintiffs and Defendant Bob's request an adjournment of the initial conference of July 23, 2021, and submission of Rule 26(f) Report by July 21, 2021. ECF No. 13. The proposed new date for the initial conference is September 3, 2021, with submission of the Rule 26(f) Report by September 1, 2021.

This is the first request for an extension of time to respond or answer the FAC. This is the third request for adjournment of the initial conference date and submission of the accompanying Rule 26(f) Report. The prior two requests were granted. The requested extension and adjournment do not affect any scheduled dates besides those indicated in this letter. This request is submitted at least 48 hours prior to the dates sought to be adjourned and extended. Thank you.

Respectfully submitted,

/s/Spencer Sheehan

*Time to respond to the Complaint  
extended to 8/20/21.*

*Rule 26 (f) report to be submitted by  
9/1/21.*

*initial conference canceled until the Court  
has reviewed the Rule 26 (f) report. so ordered.  
7/8/21 Jrg/ldg/asds*

## Certificate of Service

I certify that on July 8, 2021, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiffs' Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan